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March 7, 2016

VIA ECF

Hon. Roanne L. Mann, U.S.M.J.
United States District Court
Eastern District of New York
225 Cadman Plaza East
Brooklyn, New York 11201

RE: Commercial Lubricants v. Safety-Kleen Systems, Inc.
USDC - Docket No.: 1:14-V-07483
BS&C File No.: ZA6-3878

JOINT LETTER – MOTION FOR PROTECTIVE ORDER

Dear Judge Mann:

We represent the defendant, Safety-Kleen Systems, Inc. in this matter. Pursuant to Local Civil Rule 7.1(d), we respectfully submit a joint letter – motion requesting that this court endorse the enclosed Protective Order agreed to by the parties. The plaintiff, Commercial Lubricants, LLC, joins in this motion.

The parties have conducted significant discovery, including the depositions of five party representatives, as well as exchanging written discovery and cumulative documents. Most recently, the parties have requested that each other supplement discovery responses, and make available for further depositions additional party representatives. Much of the supplemental information, including information to be learned at depositions, may be considered by the parties to be privileged, confidential or proprietary in nature. As a result, the parties have agreed to the enclosed proposed Protective Order. The parties believe that the Protective Order will assist the parties to reasonably respond to each other's discovery requests and supplemental discovery requests, and to protect from the public disclosure of privileged, confidential or proprietary information. The Protective Order will assist the parties to avoid unnecessary motion practice relating to confidential materials that may be produced, restricted by the protective order, but which would otherwise have been withheld and could become the subject of motions to compel. The parties believe the Protective Order includes reasonable and fair terms which permit a party to challenge the designation of information as confidential.

Thank you for Your Honor's consideration of this letter motion.

Very truly yours,

/s/ Aaron R. White

Aaron R. White
Mark A. Aronsson

ARW/aeb

Enclosure

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CERTIFICATE OF SERVICE

I hereby certify that this document filed through the ECF system will be sent electronically to the registered participants as identified on the Notice of Electronic Filing (NEF) and paper copies will be sent to those indicated as non-registered participants on this 7th day of March, 2016.

/s/ Aaron R. White